

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
DIVISION

2015 SEP 23 PM 12:55

U.S. DISTRICT COURT
MIDDLE DISTRICT OF TN

Donna Lee Miller

Gwen Burt

(Name of Plaintiff(s))

v.

DHS / State of Tennessee

(Name of Defendant(s))

Civil Case No. _____

Jury Trial Requested: ☒ YES ☐ NO

COMPLAINT UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964 AS AMENDED

1. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 as amended for employment discrimination. Jurisdiction is specifically conferred on the Court by 42 U.S.C. § 2000e-5. Equitable and other relief is also sought under 42 U.S.C. § 2000e-5(g).

2. Plaintiff, Donna Lee Miller, is a citizen of the United States and resides at

702 Silver Hill Drive

Street address

Murfreesboro

City

Rutherford

County

Tennessee

State

37129

Zip Code

(615) 278-0743

(area code) phone number

(If there is more than one plaintiff, provide the same information for each plaintiff below):

Gwen Burt Murfreesboro, Tennessee

3. Defendant, DHS - State of Tennessee lives at or its business is located at:

Downtown Nashville / Citizens Plaza Bldg.

Street address

City

Davidson

County

Tennessee

State

37

Zip Code

(615) 313-4000 / 615-741-4841

(area code) phone number

(If there is more than one defendant, provide the same information for each defendant below):

4. Plaintiff sought employment from the defendant or was employed by the defendant at:

Deaderick St. CPB Nashville
 Street address City
Davidson Tennessee _____
 County State Zip Code

5. Defendant discriminated against plaintiff in the manner indicated in paragraphs 8–9 of this complaint on or about 16th December 2014.
 day month year

6. Plaintiff filed charges against the defendant with the Equal Employment Opportunity Commission charging the defendant with the acts of discrimination indicated in paragraphs 8–9 of this complaint on or about 19 April 2015.
 day month year

(Attach a copy of the a charges filed with the Equal Employment Opportunity Commission attached to this complaint.)

7. The Plaintiff received a copy of the Notice of Right to Sue issued by the Equal Employment Opportunity Commission or the U.S. Department of Justice on 20 August 2015.
 day month year

(Attach a copy of the Notice to this complaint.)

8. Because of plaintiff's (1) ✓ race, (2) _____ color, (3) _____ sex, (4) _____ religion, or (5) _____ national origin, the defendant:

- (a) ✓ failed to employ plaintiff.
- (b) _____ terminated plaintiff's employment.
- (c) ✓ failed to promote plaintiff.
- (d) ✓ retaliated against plaintiff for having filed a charge of discrimination.

Migraines
High Blood Pressure³
Mechanical Aortic Valve (Heart)

(e) ☒ other. Explain: Disability/Health - Mechanical Aortic Valve (Heart Disease)

Migraines

High Blood Pressure, Fibromyalgia, Stroke

9. The circumstances under which defendant discriminated against plaintiff were as follows:

Race, Color, discrimination - disability, retaliation, age.
Moved Owen and I out as we are older also we have
many years experience. Hired brought in younger employees,
filled open positions. Retaliated for previous complaints filed.
Owen Burt has 40 years with the State. Donna L. Miller has fourteen
years with the State, kept black employees in our group moved
us - White race out. Comments made to Donna Miller about
complaints to EEOC and other officials. (See claim filed to EEOC.)

(You may use additional paper if necessary.)

10. The acts set forth in paragraph 8 of this complaint

- (a) ☒ are still being committed by defendant.
(b) ☐ are no longer being committed by defendant.
(c) ☒ may still be being committed by defendant.

WHEREFORE, plaintiff prays that the Court grant the following relief to the plaintiff:

Positions to State Offices downtown Nashville, Tennessee
returned. Punitive and compensatory damages paid to
Owen Burt and Donna Miller per our settlement request
letter. (See Attached)

11. I request a jury trial: ☒ yes ☐ no

Donna Lee Miller

Signature of plaintiff(s)